



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-831-5508

August 17, 2001

James Shafer, Remedial Project Manager
U.S. Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: Old Fire Fighter Training Area Feasibility Study, Naval Station Newport, Newport, Rhode Island

Dear Mr. Shafer,

The Rhode Island Department of Environmental Management, Office of Waste Management (RIDEM) has reviewed the Navy's response to comments on the Feasibility Study for the Old Fire Fighter Training Area dated 3 August 2001. Attached are comments generated as a result of this review. If the Navy has any questions concerning the above please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

A handwritten signature in cursive script that reads "Paul Kulpa".

Paul Kulpa
Office of Waste Management

cc: Mathew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Kymberlee Keckler, EPA Region I
Melissa Griffin, NSN

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**Evaluation of Navy's Response to
Comments on Draft Feasibility Study
For
Soil and Marine Sediments
Old Fire Fighter Training Area**

**6. Page 1-13, Section 1.9, Human Health Risk Assessment
Paragraph 1.**

The section of the report notes that the various risk assessments for surface, and subsurface soils, and sediments slightly exceeded or exceeded RIDEM's risk range. This would imply that RIDEM concurred with the risk assessments and the results of this assessment slightly exceeded or exceeded DEM requirements. This is not the case, as the assessments did not conform to RIDEM risk assessments criteria. In order to avoid confusion this section of the report should note that the chemical specific RIDEM standards were exceeded at the site.

Evaluation of Response

The Navy has stated that the requested changes may be applied to other sections of the report. The Office of Waste Management agrees. In regards to this section, the report may either note that RIDEM's standards were exceeded or that the risk assessment did not conform to RIDEM's criteria.

**11. Page 2-9, Section 2.2.2.3, Development of Remedial Objectives for Soil
Whole Section.**

Although not stated, the report should note that either the lower of the RIDEM Direct Exposure Standards or the Sediment PRGs will be applied to the beach.

Evaluation of Response

The Navy has noted that the RIDEM's residential scenario is not a recreational scenario and therefore is not applicable to recreational use of the beach. Please be advised that RIDEM's residential scenario is applied to recreational areas. Accordingly, the Office of Waste Management reiterates the comment.

32. Page 5-27, Section 5.5.4, Sediment Alternative 4 Dredging and Disposal, Cost

The estimated cost to dredge the contaminated materials is based upon dredging via a haul road. As cost is a modifying factor in the FS selection process the report should evaluate other alternatives to haul road dredging, such as, dredging via a barge, barge and land dredging, or behind a temporary Portadam. Cost for these alternatives should also be included in the report.

Evaluation of Response

The Navy has stated that the Feasibility Study is designed to evaluate representative technologies for evaluating alternatives. Accordingly, the use of conventional dredging operations will not be evaluated. The Office of Waste Management's concern is that the use of a haul road may not be warranted and/or it may not be the most cost-effective option. As cost is a modifying factor in the FS process, the report should evaluate other dredging measures, which may cost less than the proposed method.

35. **Table 2.8, Selection of Soil COPCs.**

During remedial investigation activities, a variety of oils were observed at the site (heavy oils, hydraulics, fuel oils, oil sludges, etc). Samples of the various oil types were not collected and analyzed (certain efforts were designed to visually determine the extent of contamination and or only the predominant oil type was tested, etc). Therefore, please modify the COPC table to include the full list of RIDEM regulated Method 1 SVOCs.

Evaluation of Response

As stated, a wide variety of oils were disposed of at the site and burned. Accordingly, the full list of SVOCs should be employed as this would be representative of the different oil types and combustion by-products.